

# HICKS THOMAS LLP

A REGISTERED LIMITED LIABILITY PARTNERSHIP

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July 17, 2014

Regional Freedom of Information Officer  
U.S. EPA, Region 2  
290 Broadway, 26<sup>th</sup> Floor  
New York, NY 10007-1866

Re: *Suffolk County Water Authority v. The Dow Chemical Company, et al.*  
Index No. 024852/2010; FOIA Request for Records

Dear Sir/Madam:

Please provide us with the USEPA records pertaining to the Blydenburgh Landfill/Islip Municipal Sanitary Landfill, 440/600 Blydenburgh Road, Hauppauge, New York ("Blydenburgh"), EPA ID: NYD980506901, including but not limited to all:

1. documents in your possession, custody and control concerning or relating to the presence or detection of PCE<sup>1</sup> at Blydenburgh.
2. documents in your possession, custody and control concerning or relating to the source or sources of PCE at Blydenburgh.
3. documents in your possession, custody and control concerning or relating to any corrective measure<sup>2</sup> taken due to alleged contamination at Blydenburgh.
4. all communications between the EPA and the Suffolk County Water Authority relating to the presence of PCE at Blydenburgh.

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<sup>1</sup> The term "PCE" shall mean the chemical compound perchloroethylene, also known and referred to as PERC, tetrachloroethylene and tetrachloroethene, and its degradation products (i.e., trichloroethylene (TCE), dichloroethylene (DCE) and vinyl chloride.

<sup>2</sup> The term "Corrective Measure(s)" shall mean and include: (a) the design, construction, operation and maintenance of a treatment facility or equipment to remove or reduce the level of a contaminant in a well or water source; (b) the blending of water to remove or reduce the level of contaminant in a well or water source; (c) the destruction of a well or removal from service of a well as a result of a contaminant in a well or water source; (d) the reduction in use of a well as a result of a contaminant in a well or water source.

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If the cost of these documents will exceed \$500, please contact us for approval before making any copies. The records requested may be in electronic format where economical or practical.

Thank you for your prompt attention to this request. If you have any questions or concerns, please do not hesitate to contact us.

Very truly yours,

A handwritten signature in black ink, appearing to read 'Allison Ford', with a stylized, flowing script.

Allison Ford

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